

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS INSTITUTE OF)
TECHNOLOGY,)
Plaintiff,)
v.) Civil Action No.: 05-10990 DPW
HARMAN INTERNATIONAL INDUSTRIES,)
INCORPORATED,)
Defendant.)

**[PROPOSED] STIPULATED ORDER
AMENDING PROTECTIVE ORDER REGARDING CONFIDENTIALITY**

Whereas, the Court entered a Stipulated Protective Order ("Protective Order") in this action on January 31, 2006 (Docket Entry 42);

Whereas, Plaintiff Massachusetts Institute of Technology ("MIT") and Defendant Harman International Industries, Inc. ("Harman") have in good faith conferred and have agreed upon the following amendments to the Protective Order entered in this action on January 31, 2006;

Now, therefore, MIT and Harman stipulate, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, subject to the approval of the Court, as follows:

1. The Protective Order, entered in this action on January 31, 2006, shall govern any designated record of information produced in this action, except as otherwise set forth herein.
2. In addition to the materials identified in the January 31, 2006 Protective Order, "Highly Confidential" materials shall include all materials designated "Outside Counsel Only," but for any materials which are publicly available.

3. In addition to the individuals identified in Paragraph 6 of the Protective Order, the following additional individuals shall have access to any information, documents and things designated as "Highly Confidential" under this Protective Order:

- a. the Designated Representative for each Party, as set forth in Paragraph 5(b) of the Protective Order.

Stipulated and Agreed to this 23rd day of March, 2006.

Massachusetts Institute of Technology

By its attorneys,

/s/ Steven M. Bauer

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SO ORDERED:

Judith Gail Dein

Douglas P. Woodlock *Judith Gail Dein*
United States District Judge
Hegeman

Dated

4/4/06